

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709  
MINA CHANG  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: (702) 388-6055  
mina.chang@usdoj.gov  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DOMINIQUE WELLS,  
  
Defendant.

Case No. 2:14-cr-00280-JCM-GWF

**STIPULATION TO CONTINUE JULY 8,  
2024 REVOCATION HEARING**

(First Request)

The parties, by and through the undersigned, respectfully submit the following Stipulation and Proposed Order for the Court's consideration.

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for the government and undersigned counsel for the defendant, Dominique Wells, that the revocation hearing based on the June 2024 petition (ECF No. 440) in the above-captioned matter, currently set for July 8, 2024 at 10:30 a.m., be vacated and continued to a date and time convenient to the Court, but no sooner than 14 days.

This Stipulation is entered into for the following reasons:

1. Defendant Wells' revocation hearing is currently set for July 8, 2024 at 10:30 a.m.

2. On July 1, 2024, defense counsel, Assistant Federal Public Defender Joanne L. Diamond, filed a motion to withdraw as counsel and requested the appointment of CJA counsel due to a recently discovered conflict of interest between the Federal Public Defender's Office and defendant Mr. Dominique Wells. ECF No. 450.
3. A continuance is needed to provide time for the appointment of new defense counsel, and to give new counsel the opportunity to investigate matters related to litigation and discovery in this matter.
4. This continuance is not sought for purposes of delay.

This is the first request for a continuance of the July 8, 2024 revocation hearing.

DATED this 2nd day of July, 2024.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

/s/ Joanne Diamond  
JOANNE DIAMOND  
Assistant Federal Public Defender  
Counsel for WELLS

/s/ Mina Chang  
MINA CHANG  
Assistant United States Attorney

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709  
MINA CHANG  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: (702) 388-6055  
mina.chang@usdoj.gov  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINIQUE WELLS,

Defendant.

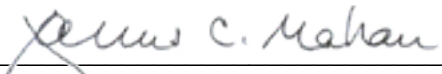
Case No. 2:14-cr-00280-JCM-GWF

**ORDER TO CONTINUE  
REVOCATION HEARING**

**ORDER**

IT IS HEREBY ORDERED that the revocation of supervised release hearing in *United States v. Dominique Wells*, 2:14-cr-00280-JCM-GWF, currently set for July 8, 2024, at 10:30 a.m., is hereby VACATED and RESET for **September 13, 2024, at 10:00 a.m.**

DATED July 3, 2024.

  
\_\_\_\_\_  
HON. JAMES C. MAHAN  
U.S. DISTRICT COURT JUDGE